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May 19, 2006

Docket Clerk, Fruit and Vegetable Programs  
Agricultural Marketing Service  
U.S. Department of Agriculture  
1400 Independence Avenue, SW.  
Stop 0243  
Washington, DC 20250-0243  
Attn: Trista Etzig

*On behalf of Iott Ranch & Orchard, Inc., I am providing comments in response to the April 20, 2006 proposed rule: Specialty Crop Block Grant Program; Notice of Request for Approval of a New Information Collection.*

*IRO is a midsize, family farm operation. We farm almost 600 acres of cabbage, which is sold to processors and wholesalers for fresh market. We have about 400 acres of processing tomatoes sold to Red Gold and Hirzel Canneries. We also have 75 acres of fresh market tomatoes which are sold to various farm markets and wholesale distributors..*

*We would like to highlight two major concerns with the proposed rule:*

- 1. The rule is inconsistent with the clear intent of Congress when it passed the Specialty Crop Competitive Act in 2004 (Public Law 108-465) and will limit consumer choice by excluding the promotion of all types of specialty crops – including canned fruits and vegetables.*

*Section 1290.4 of the proposed rule: Eligible grant project, states that:  
(a) To be eligible for a grant, the project(s) must enhance the competitiveness of specialty crops. **Priority will be given to fresh specialty crop projects.***

*This language is inconsistent with the authorizing legislation and will limit competitiveness and ultimately consumer choice. Congress did not intend for one form of specialty crop to be given priority over others, nor to restrict state departments of agriculture from*

*promoting a variety of specialty crops. USDA has exceeded its regulatory authority in giving preference to fresh specialty crops.*

2. *The rule does not recognize the growing body of evidence on the benefits of canned fruits and vegetables.*

*The proposed rule is counter to federal guidelines on nutrition. The **Dietary Guidelines for Americans 2005** identifies canned foods as a way to help people consume the recommended daily variety and amount of fruits and vegetables. Nowhere in the Dietary Guidelines is preference given for fresh fruits and vegetables. The attached fact sheet – “Can Fit” – highlights the many positive attributes associated with canned fruits and vegetables, including their nutrient profile, consumer preference, nutrient losses for fresh produce, nutrient retention for canned and food safety.*

*On behalf of IRO, thank you for considering these comments. IRO urges USDA to issue a final rule that is consistent with the will of Congress and recognizes the importance of promoting all types and forms of healthy and nutritious specialty crops. As proposed, this rule will restricting promotion efforts and is counter to open competition. It also does not reflect current scientific knowledge of the importance of all types and forms of fruits and vegetables in promoting health.*

*Please visit our web site at [www.tomatoes.com](http://www.tomatoes.com)*

*Sincerely,*

*Kim Iott  
Vice President  
Iott Ranch & Orchard, Inc*